



*Commonwealth of Virginia*

***VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY***

**BLUE RIDGE REGIONAL OFFICE**

901 Russell Drive, Salem, Virginia 24153

(540) 562-6700 FAX (540) 562-6725

[www.deq.virginia.gov](http://www.deq.virginia.gov)

Matthew J. Strickler  
Secretary of Natural Resources

David K. Paylor  
Director  
(804) 698-4000

Robert J. Weld  
Regional Director

July 31, 2020

Mr. Steven DuVal  
Site Manager  
Eastman Performance Films, LLC  
P. O. Box 5068  
Martinsville, VA 24115

Location: Henry County  
Registration No.: 30877

Dear Mr. DuVal:

Attached is a renewal Title V permit to operate your facility pursuant to 9VAC5 Chapter 80 Article 1 of the Virginia Regulations for the Control and Abatement of Air Pollution. The attached permit will be in effect beginning July 31, 2020.

In the course of evaluating the application and arriving at a final decision to issue this permit, the Department of Environmental Quality (DEQ) deemed the application complete on January 18, 2019 and solicited written public comments by placing a newspaper advertisement in *The Martinsville Bulletin* on June 16, 2020. The thirty-day required comment period, provided for in 9VAC5-80-270 expired on July 16, 2020.

This permit contains legally enforceable conditions. Failure to comply may result in a Notice of Violation and/or civil charges. Please read all permit conditions carefully.

This permit approval to operate shall not relieve Eastman Performance Films, LLC of the responsibility to comply with all other local, state, and federal permit regulations.

The Board's Regulations as contained in Title 9 of the Virginia Administrative Code 5-170-200 provide that you may request a formal hearing from this case decision by filing a petition with the Board within 30 days after this case decision notice was mailed or delivered to you. Please consult the relevant regulations for additional requirements for such requests.

As provided by Rule 2A:2 of the Supreme Court of Virginia, you have 30 days from the date you actually received this permit or the date on which it was mailed to you, whichever occurred first, within which to initiate an appeal of this decision by filing a Notice of Appeal with:

David K. Paylor, Director  
Department of Environmental Quality  
P. O. Box 1105  
Richmond, VA 23218

If this permit was delivered to you by mail, three days are added to the thirty-day period in which to file an appeal. Please refer to Part Two A of the Rules of the Supreme Court of Virginia for information on the required content of the Notice of Appeal and for additional requirements governing appeals from decisions of administrative agencies.

If you have any questions concerning this permit, please contact Erin Rau at (540) 562-6773 or [erin.rau@deq.virginia.gov](mailto:erin.rau@deq.virginia.gov).

Sincerely,



Robert J. Weld  
Regional Director

Attachments: Permit  
Attachment A – CAM Plan

cc: Ricky Nelson, HSES Manager, Eastman Performance Films, LLC ([Ricky.Nelson@eastman.com](mailto:Ricky.Nelson@eastman.com))  
Riley Burger, EPA Region III ([burger.riley@epa.gov](mailto:burger.riley@epa.gov))  
Susan Tripp, DEQ OAPP ([susan.tripp@deq.virginia.gov](mailto:susan.tripp@deq.virginia.gov))  
Matthew Porter, DEQ BRRO Air Compliance Inspector (electronic)



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**Federal Operating Permit**

**Article 1**

This permit is based upon the requirements of Title V of the Federal Clean Air Act and Chapter 80, Article 1, of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution. Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act, and 9VAC5-80-50 through 9VAC5-80-300, of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name: Solutia, Inc.  
Facility Name: Eastman Performance Films, LLC  
Facility Location: 47 Brenda Drive, Axton, VA 24054  
Registration Number: 30877  
Permit Number: BRRO-30877

This permit includes the following programs:  
Federally Enforceable Requirements - Clean Air Act

July 31, 2020

Effective Date

  
Robert J. Weld, Regional Director

July 30, 2025

Expiration Date

July 31, 2020

Signature Date

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## **Facility Information**

### **Permittee**

Solutia, Inc.  
P.O. Box 66760  
St. Louis, MO 63166-6760

### **Responsible Official**

Steven DuVal  
Site Director

### **Facility**

Eastman Performance Films, LLC – Axton Plant  
47 Brenda Drive  
Axton, VA 24054

### **Contact Person**

Ricky Nelson  
HSES Manager  
(276) 627-3377

County-Plant Identification Number: 51-089-00091

Facility Description: NAICS 326130 – Laminated Plastics Plate, Sheet (except Packaging), and Shape Manufacturing - This industry comprises establishments primarily engaged in laminating plastics profile shapes such as plate, sheet (except packaging), and rod. The lamination process generally involves bonding or impregnating profiles with plastics resins and compressing them under heat.

Eastman Performance Films, LLC is a manufacturer of solar controlled window films that requires the dyeing of polyester films using solvent-based dyes. The facility in Axton has two Dye Lines (#5 and #6).

## Emission Units

Process Equipment to be operated consists of:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description *	PCD ID	Pollutant Controlled	Applicable Permit Date
EU01	S01	Dye Line No. 5, includes dye bath, wash baths, and dryer	48,750 ft <sup>2</sup> /hr	Custom design ethylene glycol recovery system with precooler and mist eliminator	C01	VOC/HAP	June 1, 2020
EU02	S02	Dye Line No. 6, includes dye bath, wash baths, and dryer	48,750 ft <sup>2</sup> /hr	Custom design ethylene glycol recovery system with precooler and mist eliminator	C02	VOC/HAP	June 1, 2020
EU15	S03	Sigma Thermal process heater for Dye Line No. 5	3.5 MMBtu/hr	-	-	-	-
EU16	S04	Sigma Thermal process heater for Dye Line No. 6	3.5 MMBtu/hr	-	-	-	-

\*The Size/Rated capacity and PCD efficiency is provided for informational purposes only, and is not an applicable requirement.

## **Fuel Burning Equipment Requirements – (EU15 and EU16)**

### **Limitations**

1. **Fuel Burning Equipment Requirements – Limitations** – Visible emissions from the Sigma Thermal process heaters (EU15 and EU16) stacks shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity.  
(9VAC5-80-110 and 9VAC5-50-80)

## **MACT Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters - (EU15 and EU16)**

### **General Compliance Requirements**

2. **MACT Subpart DDDDD** – The permittee shall comply with the applicable requirements of 40 CFR 63 Subpart DDDDD as listed in Conditions 3 through 11 by the applicable compliance date as specified in §63.7495(b).  
(9VAC5-80-110 and 40 CFR 63.7495)
3. **MACT Subpart DDDDD** – The permittee shall comply with the applicable General Provisions as specified in 40 CFR 63.7565.  
(9VAC5-80-110 and 40 CFR 63.7565)

### **Work Practice Standards**

4. **MACT Subpart DDDDD** – The permittee shall comply with the work practice specified in 40 CFR 63.7500(e).  
(9VAC5-80-110 and 40 CFR 63.7500)
5. **MACT Subpart DDDDD** – The permittee shall comply with the applicable work practice tune-up requirements specified in 40 CFR 63.7515(d).  
(9VAC5-80-110 and 40 CFR 63.7515)

### **Initial and Continuous Compliance Requirements**

6. **MACT Subpart DDDDD** – The permittee shall comply with the initial compliance demonstration for the work practice standards specified in 40 CFR 63.7530(e).  
(9VAC5-80-110 and 40 CFR 63.7530)
7. **MACT Subpart DDDDD** – The permittee shall comply with the continuous compliance requirements specified in 40 CFR 63.7540(a)(12) and (b).  
(9VAC5-80-110 and 40 CFR 63.7540)

## **Notification, Reports, and Records**

8. **MACT Subpart DDDDD** – The permittee shall comply with the notification requirements specified in 40 CFR 63.7545(a) and (e).  
(9VAC5-80-110 and 40 CFR 63.7545)
9. **MACT Subpart DDDDD** – The permittee shall comply with the reporting requirements specified in 40 CFR 63.7550(a), (b), and (c).  
(9VAC5-80-110 and 40 CFR 63.7550)
10. **MACT Subpart DDDDD** – The permittee shall keep records as specified in 40 CFR 63.7555(a)(1).  
(9VAC5-80-110 and 40 CFR 63.7555)
11. **MACT Subpart DDDDD** – The permittee shall keep records in a form suitable and readily available for expeditious review according to 40 CFR 63.7560(a), (b), and (c).  
(9VAC5-80-110 and 40 CFR 63.7560)

## **Process Equipment Requirements - (EU01 and EU02)**

### **Limitations**

12. **Process Equipment Requirements – Emission Controls** – Volatile organic compound (VOC) emissions from each dye bath shall be controlled by a fume capture hood and an ethylene glycol (EG) recovery system (pre-cooler in series with a Brinks mist eliminator). The capture hood and EG recovery system shall be provided with adequate access for inspection and shall be in operation when the dye lines (Nos. 5 & 6) are operating.  
(9VAC5-80-110 and Condition 1 of the 06/01/2020 Permit Document)
13. **Process Equipment Requirements – Control Efficiency** – The EG recovery systems shall demonstrate a control efficiency by stack test for VOCs of no less than 95 percent on a mass basis. [The stack testing requirement has been completed and found in compliance.]  
(9VAC5-80-110 and Condition 2 of the 06/01/2020 Permit Document)
14. **Process Equipment Requirements - VOC Work Practice Standards** – At all times the disposal of volatile organic compounds shall be accomplished by taking measures, to the extent practicable, consistent with air pollution control practices for minimizing emissions. Volatile organic compounds shall not be intentionally spilled, stored in open containers, or handled in any other manner that would result in evaporation beyond that consistent with air pollution practices for minimizing emissions.  
(9VAC5-80-110 and Condition 3 of the 06/01/2020 Permit Document)
15. **Process Equipment Requirements – VOC Control** – The exit air temperature from each EG recovery system exhaust stack shall be maintained at  $\leq 100^{\circ}$  F. If the temperature



reaches 110° F, the permittee shall take corrective action to return the temperature to  $\leq 100^{\circ}$  F. If the EG recovery system exhaust temperature reaches 120° F, the permittee shall shut down the dye bath until the cause has been corrected and the exhaust temperature can be maintained at  $\leq 100^{\circ}$  F.

(9VAC5-80-110 and Condition 11 of the 06/01/2020 Permit Document)

16. **Process Equipment Requirements – VOC Control** – The minimum pressure drop across the dye bath capture system is -0.25 inches of water (“ WC). If the pressure drop is -0.24” WC or less, the permittee shall shut down the dye bath until the cause has been corrected and the pressure drop can be returned to -0.25” WC or greater.

(9VAC5-80-110 and Condition 12 of the 06/01/2020 Permit Document)

17. **Process Equipment Requirements – VOC Control** – The pressure drop across each Brinks demister shall not be less than 4.0 inches of water or be greater than 12.0” WC. If the pressure drop is outside of the prescribed range, the permittee shall shut down the dye bath until the cause has been corrected and the pressure drop can be maintained within the prescribed range.

(9VAC5-80-110 and Condition 13 of the 06/01/2020 Permit Document)

18. **Process Equipment Requirements – VOC Control** – Emissions shall be controlled by proper operation and maintenance of the dye bath fume capture and EG recovery systems. The permittee shall develop, maintain, and have available to all operators good written operating procedures and a maintenance schedule for the EG recovery system and dye bath capture equipment. These procedures shall be based on the manufacturer’s recommendations, at a minimum.

(9VAC5-80-110 and Condition 14 of the 06/01/2020 Permit Document)

19. **Process Equipment Requirements – Emission Limits** – Emissions from each EG recovery system shall not exceed the limits specified below:

Volatile Organic Compounds	14.54 lbs/hr
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These emissions are derived from the estimated overall emission contribution from the Operating Limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Condition numbers 15, 16, 17, and 18.

(9VAC5-80-110 and Condition 15 of the 06/01/2020 Permit Document)

20. **Process Equipment Requirements – Facility Wide Emission Limits** – Total emissions from the window film manufacturing facility shall not exceed the limits specified below:

Volatile Organic Compounds	248.0 tons/yr
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These emissions are derived from the estimated overall emission contribution from the Operating Limits. Exceedance of the operating limits may be considered credible evidence

of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Condition numbers 15, 16, 17, and 18.  
(9VAC5-80-110 and Condition 16 of the 06/01/2020 Permit Document)

21. **Process Equipment Requirements – Visible Emission Limit** – Visible emissions from the facility's roof exhaust vents, wall exhaust vents and EG recovery system exhaust stacks shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity as determined by the EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown, and malfunction.  
(9VAC5-80-110 and Condition 17 of the 06/01/2020 Permit Document)

### **Monitoring**

22. **Process Equipment Requirements – Monitoring Devices** – Each EG recovery system shall be equipped with a device to continuously measure and record exhaust temperature. Each monitoring device shall be installed, maintained, calibrated and operated in accordance with approved procedures which shall include, at a minimum, the manufacturer's written requirements or recommendations. Each monitoring device shall be provided with adequate access for inspection and shall be in operation when each dye line is operating.  
(9VAC5-80-110 and Condition 4 of the 06/01/2020 Permit Document)
23. **Process Equipment Requirements – Monitoring Device Operation** – To ensure good performance, each EG recovery system shall be equipped with an audible alarm to alert the operator when the exhaust temperature reaches 110° F. The permittee shall continuously record measurements from the temperature measurement device.  
(9VAC5-80-110 and Condition 5 of the 06/01/2020 Permit Document)
24. **Process Equipment Requirements – Monitoring Devices** – Each EG recovery system shall be equipped with a device to continuously measure the pressure drop across the Brinks demister. Each monitoring device shall be installed, maintained, calibrated and operated in accordance with approved procedures which shall include, as a minimum, the manufacturer's written requirements or recommendations. Each monitoring device shall be provided with adequate access for inspection and shall be in operation when each dye line is operating.  
(9VAC5-80-110 and Condition 6 of the 06/01/2020 Permit Document)
25. **Process Equipment Requirements – Monitoring Device Observation** – To ensure good performance, the monitoring device used to continuously measure the pressure drop across each Brinks demister (Condition No. 24) shall be observed by the permittee with a frequency of not less than once per day that the dye line is operated. The permittee shall keep a log of the pressure drop observations from each EG recovery system.  
(9VAC5-80-110 and Condition 7 of the 06/01/2020 Permit Document)

26. **Process Equipment Requirements – Monitoring Devices** – Each dye bath fume capture hood exhaust duct shall be equipped with a device to continuously measure the pressure drop across the fume capture system. Each monitoring device shall be installed, maintained, calibrated and operated in accordance with approved procedures which shall include, as a minimum, the manufacturer's written requirements or recommendations. Each monitoring device shall be provided with adequate access for inspection and shall be in operation when each dye line is operating.  
(9VAC5-80-110 and Condition 8 of the 06/01/2020 Permit Document)
27. **Process Equipment Requirements – Monitoring Device Observation** – To ensure good performance, the monitoring device used to continuously measure the pressure drop across each dye bath fume capture system (Condition No. 26) shall be observed by the permittee with a frequency of not less than once per shift that the dye line operated. The permittee shall keep a log of the pressure drop observations from each dye bath fume capture hood exhaust duct.  
(9VAC5-80-110 and Condition 9 of the 06/01/2020 Permit Document)
28. **Process Equipment Requirements - Compliance Assurance Monitoring (CAM)** - The permittee shall monitor, operate, calibrate and maintain the EG Recovery System controlling Dye Line No. 5 and Dye Line No. 6 (EU01 and EU02) according to the CAM Plan in Attachment A.  
(9VAC5-80-110 and 40 CFR 64.6 (c))
29. **Process Equipment Requirements - Compliance Assurance Monitoring (CAM)** - The permittee shall conduct the monitoring and fulfill the other obligations specified in 40 CFR 64.7 through 40 CFR 64.9.  
(9VAC5-80-110 and 40 CFR 64.6 (c))
30. **Process Equipment Requirements - Compliance Assurance Monitoring (CAM)** - At all times, the permittee shall maintain the monitoring equipment, including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.  
(9VAC5-80-110 and 40 CFR 64.7 (b))
31. **Process Equipment Requirements - Compliance Assurance Monitoring (CAM)** - Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the Dye Line No. 5 and Dye Line No. 6 (EU01 and EU02) are operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of compliance assurance monitoring, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid

data. Monitoring failures that are caused in part by inadequate maintenance or improper operation are not malfunctions.

(9VAC5-80-110 and 40 CFR 64.7 (c))

32. **Process Equipment Requirements - Compliance Assurance Monitoring (CAM)** - Upon detecting an excursion or exceedance, the permittee shall restore operation of the Dye Line No. 5 and Dye Line No. 6 (EU01 and EU02) (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup and shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator, designated condition, or below the applicable emission limitation or standard, as applicable.  
(9VAC5-80-110 and 40 CFR 64.7 (d)(1))

33. **Process Equipment Requirements - Compliance Assurance Monitoring (CAM)** - Determination that acceptable procedures were used in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.  
(9VAC5-80-110 and 40 CFR 64.7(d)(2))

34. **Process Equipment Requirements - Compliance Assurance Monitoring (CAM)** - If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the Blue Ridge Regional Office and, if necessary, submit a proposed modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.  
(9VAC5-80-110 and 40 CFR 64.7(e))

35. **Process Equipment Requirements - Compliance Assurance Monitoring (CAM)** - If the number of exceedances or excursions exceeds 5 percent duration of the operating time for the Dye Line No. 5 and Dye Line No. 6 (EU01 and EU02) for a semiannual reporting period, the permittee shall develop, implement and maintain a Quality Improvement Plan (QIP) in accordance with 40 CFR 64.8. If a QIP is required, the permittee shall have it available for inspection. The QIP initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the

permittee shall modify the plan to include procedures for conducting one or more of the following, as appropriate:

- a. Improved preventative maintenance practices;
- b. Process operation changes;
- c. Appropriate improvements to control methods;
- d. Other steps appropriate to correct control performance; and
- e. More frequent or improved monitoring.

(9VAC5-80-110 and 40 CFR 64.8(a) and (b))

36. **Process Equipment Requirements – Visible Emissions Observations** – At least one time per calendar month, when each dye line is operating, an observation of the presence of visible emissions shall be made. Visual observations shall consist of a visual survey of the EG recovery system exhaust stacks, roof vents and wall vents over a 15-second period while the process is operating to identify the presence or absence of visible emissions, other than condensed water vapor.

The permittee shall maintain a visual observation log for each of the EG recovery system exhaust stacks, roof vents and wall vents to demonstrate compliance. The log shall include the date, time and location of the observations, name of the observer, whether or not there were visible emissions, any visible emission evaluation (VEE) recordings and any necessary corrective action.

If any visible emissions are observed, the permittee shall immediately take the actions in a. or b. below:

- a. Verify that the equipment and/or control device causing the visible emission is operating according to the manufacturer's specifications or other site-specific acceptable operating conditions. If the equipment or control device is not operating properly, the permittee shall take timely corrective action such that the dye line(s) resumes operation with no visible emissions, or,
- b. Perform a VEE in accordance with 40 CFR 60, Appendix A, Method 9 to assure visible emissions from the EG recovery system exhaust stacks, roof vents, and wall vents do not exceed 20 percent opacity. The VEE shall be conducted for a minimum of six minutes. If any of the observations exceed 20 percent, the VEE shall be conducted for a total of 60 minutes. If visible emissions exceed the opacity requirements in Condition 21, timely corrective action shall be taken such that the line resumes operation with visible emissions of 20 percent or less.

After correction of the opacity problem, the permittee shall conduct weekly visible emission observations at that stack or process emission point. Once weekly visible emissions observations are completed for a 6-month period without observing any visible emissions, a monthly schedule may again be instituted at that stack or process emission point.

(9VAC5-80-110 E & K)

### **Recordkeeping**

**37. Process Equipment Requirements - Recordkeeping** - The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Blue Ridge Regional Office. These records shall include, but are not limited to:

- a. Emissions calculations for VOCs from the dye lines (EU01 and EU02) using calculation methods approved by the Air Compliance Manager, Blue Ridge Regional office to verify compliance with the emission limitation in Condition 20. Annual emissions are to be calculated monthly as the sum of each consecutive twelve month period.
- b. Control device monitoring records for each EG recovery system's exhaust stack temperature, dye bath fume capture system pressure drop, and demister pressure drop as required in Conditions 23, 25, and 27. The operating parameter logs required in Conditions 25 and 27 shall include the date and time, name of observer, the value of the parameter observed and any corrective action.
- c. Scheduled and unscheduled maintenance and operator training.
- d. Monthly and annual operating hours of each dye line.
- e. The results of the weekly and/or monthly opacity observation of all emissions points and any corrective actions to reduce emissions to normal operating conditions as required in Condition 36.
- f. Results of all performance tests.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

(9VAC5-80-110, 9VAC5-50-50, and Condition 21 of the 06/01/2020 Permit Document)

**38. Process Equipment Requirements - Compliance Assurance Monitoring (CAM) Recordkeeping** - The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan (QIP) required pursuant to §64.8 and any activities undertaken to implement a quality improvement plan (QIP), and other supporting information required to be maintained under

this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).  
(9VAC5-80-110 and 40 CFR 64.9(b))

## Testing

39. **Process Equipment Requirements – Stack Tests** – Upon request by the DEQ, the permittee shall conduct performance tests to demonstrate compliance with the emission limits contained in this permit. The details of the tests shall be arranged with the Air Compliance Manager, Blue Ridge Regional Office.  
(9VAC5-80-110 and Condition 18 of the 06/01/2020 Permit Document)
40. **Process Equipment Requirements – Visible Emissions Evaluations** – Upon request by the DEQ, the permittee shall conduct visible emission evaluations to demonstrate compliance with the visible emission limits contained in this permit. The details of the tests shall be arranged with the Air Compliance Manager, Blue Ridge Regional Office.  
(9VAC5-80-110 and Condition 19 of the 06/01/2020 Permit Document)
41. **Process Equipment Requirements** - The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. This includes constructing the facility/equipment such that volumetric flow rates and pollutant emission rates can be accurately determined by applicable test methods and providing a stack or duct that is free from cyclonic flow. Upon request from the DEQ, test ports shall be provided at the appropriate locations.  
(9VAC5-80-110 and Condition 10 of the 06/01/2020 Permit Document)
42. **Process Equipment Requirements** - If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the appropriate method(s) in accordance with procedures approved by the DEQ.  
(9VAC5-80-110)

## Reporting

43. **Process Equipment Requirements - Compliance Assurance Monitoring (CAM) Reporting** - The permittee shall submit CAM reports as part of the Title V semiannual monitoring reports required by General Condition 50 of this permit to the Blue Ridge Regional Office. Such reports shall include at a minimum:
  - a. Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
  - b. Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

- c. A description of the actions taken to implement a quality improvement plan (QIP) during the reporting period as specified in §64.8. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

(9VAC5-80-110 F and 40 CFR 64.9(a))

## Insignificant Emission Units

44. **Insignificant Emission Units** - The following emission units at the facility are identified in the application as insignificant emission units under 9VAC5-80-720:

Emission Unit No.	Emission Unit Description	Citation <sup>1</sup> (9VAC )	Pollutant(s) Emitted (9VAC5-80-720 B.)	Rated Capacity (9VAC5-80-720 C.)
03	6 Propane-Fired Burners for Dye Line No. 5 Dryer	9VAC5-80-720 C	-	1.2 MM Btu/hr each
04	6 Propane-Fired Burners for Dye Line No. 6 Dryer	9VAC5-80-720 C	-	1.2 MMBtu/hr each
05	Propane-Fired Modine Space Heater	9VAC5-80-720 A	-	-
06	Propane-Fired Reznor Space Heater	9VAC5-80-720 A	-	-
07	Propane-Fired Trane Make-Up Air Unit	9VAC5-80-720 A	-	-
08	Ethylene Glycol (EG) Fixed-Roof Tank	9VAC5-80-720 B	VOC, HAP	-
09	n-Methyl-2-Pyrrolidone (NMP, fresh) Fixed-Roof Tank	9VAC5-80-720 B	VOC	-
11	1 Dye Mixing Tank w/ Dye-Add Funnel for Dye Line No. 5	9VAC5-80-720 B	VOC, HAP	-
12	2 Dye Mixing Tanks w/ Dye-Add Funnels for Dye Line No. 6	9VAC5-80-720 B	VOC, HAP	-
13	2 Waste Water Storage Tanks	9VAC5-80-720 B	VOC, HAP	-
14	4 Propane (LPG) Storage Tanks	9VAC5-80-720 B	VOC	-
17	1 Heated Ethylene Glycol Reclaim Tank	9VAC5-80-720 B	VOC, HAP	-
18	Propane-Fired Intertek Space Heater	9VAC5-80-720 A	-	-



Emission Unit No.	Emission Unit Description	Citation <sup>1</sup> (9VAC )	Pollutant(s) Emitted (9VAC5-80-720 B.)	Rated Capacity (9VAC5-80-720 C.)
19	Dirty NMP (NMP, EG by-product) Fixed-Roof Tank	9VAC5-80-720 B	VOC, HAP	-

These emission units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emission units in accordance with 9VAC5-80-110. (9VAC5-80-110)

### Permit Shield & Inapplicable Requirements

45. **Permit Shield & Inapplicable Requirements** - Compliance with the provisions of this permit shall be deemed compliance with all applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements which have been specifically identified as being not applicable to this permitted facility:

Citation	Title of Citation	Description of Applicability
None identified.		

Nothing in this permit shield shall alter the provisions of §303 of the federal Clean Air Act, including the authority of the administrator under that section, the liability of the owner for any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by (i) the administrator pursuant to §114 of the federal Clean Air Act, (ii) the Board pursuant to §10.1-1314 or §10.1-1315 of the Virginia Air Pollution Control Law or (iii) the Department pursuant to §10.1-1307.3 of the Virginia Air Pollution Control Law.

(9VAC5-80-110 and 9VAC5-80-140)

### General Conditions

46. **General Conditions - Federal Enforceability** - All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.  
(9VAC5-80-110)

47. **General Conditions - Permit Expiration**

- a. This permit has a fixed term of five years. The expiration date shall be the date five years from the date of issuance. Unless the owner submits a timely and complete

application for renewal to the Department consistent with the requirements of 9VAC5-80-80, the right of the facility to operate shall be terminated upon permit expiration.

- b. The owner shall submit an application for renewal at least six months but no earlier than eighteen months prior to the date of permit expiration.
- c. If an applicant submits a timely and complete application for an initial permit or renewal under 9VAC5-80-80 F, the failure of the source to have a permit or the operation of the source without a permit shall not be a violation of Article 1, Part II of 9VAC5 Chapter 80, until the Board takes final action on the application under 9VAC5-80-150.
- d. No source shall operate after the time that it is required to submit a timely and complete application under subsections C and D of 9VAC5-80-80 for a renewal permit, except in compliance with a permit issued under Article 1, Part II of 9VAC5 Chapter 80.
- e. If an applicant submits a timely and complete application under section 9VAC5-80-80 for a permit renewal but the Board fails to issue or deny the renewal permit before the end of the term of the previous permit, (i) the previous permit shall not expire until the renewal permit has been issued or denied and (ii) all the terms and conditions of the previous permit, including any permit shield granted pursuant to 9VAC5-80-140, shall remain in effect from the date the application is determined to be complete until the renewal permit is issued or denied.
- f. The protection under subsections F 1 and F 5 (ii) of section 9VAC5-80-80 F shall cease to apply if, subsequent to the completeness determination made pursuant section 9VAC5-80-80 D, the applicant fails to submit by the deadline specified in writing by the Board any additional information identified as being needed to process the application.

(9VAC5-80-80, 9VAC5-80-110 and 9VAC5-80-170)

48. **General Conditions -Recordkeeping and Reporting** - All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:
- a. The date, place as defined in the permit, and time of sampling or measurements;
  - b. The date(s) analyses were performed;
  - c. The company or entity that performed the analyses;
  - d. The analytical techniques or methods used;

- e. The results of such analyses; and
- f. The operating conditions existing at the time of sampling or measurement.

(9VAC5-80-110)

49. **General Conditions -Recordkeeping and Reporting** - Records of all monitoring data and support information shall be retained for at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.  
(9VAC5-80-110)

50. **General Conditions -Recordkeeping and Reporting** - The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ no later than March 1 and September 1 of each calendar year. This report must be signed by a responsible official, consistent with 9VAC5-80-80 G, and shall include:

- a. The time period included in the report. The time periods to be addressed are January 1 to June 30 and July 1 to December 31; and
- b. All deviations from permit requirements. For purpose of this permit, deviations include, but are not limited to:
  - i. Exceedances of emissions limitations or operational restrictions;
  - ii. Excursions from control device operating parameter requirements, as documented by continuous emission monitoring or periodic monitoring, or Compliance Assurance Monitoring (CAM) which indicates an exceedance of emission limitations or operational restrictions; or,
  - iii. Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.
- c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that "no deviations from permit requirements occurred during this semiannual reporting period."

(9VAC5-80-110)

51. **General Conditions - Annual Compliance Certification** - Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and DEQ no later than March 1 each calendar year a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices for

the period ending December 31. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a)(3) and §504(b) of the federal Clean Air Act. The permittee shall maintain a copy of the certification for five (5) years after submittal of the certification. This certification shall be signed by a responsible official, consistent with 9VAC5-80-80 G, and shall include:

- a. The time period included in the certification. The time period to be addressed is January 1 to December 31;
- b. The identification of each term or condition of the permit that is the basis of the certification;
- c. The compliance status;
- d. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance;
- e. Consistent with subsection 9VAC5-80-110, the method or methods used for determining the compliance status of the source at the time of certification and over the reporting period;
- f. Such other facts as the permit may require to determine the compliance status of the source; and
- g. One copy of the annual compliance certification shall be submitted to EPA in electronic format only. The certification document should be sent to the following electronic mailing address:

R3\_APD\_Permits@epa.gov

(9VAC5-80-110)

52. **General Conditions - Permit Deviation Reporting** - The permittee shall notify the Blue Ridge Regional Office within four daytime business hours after discovery of any deviations from permit requirements which may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the discovery, the permittee shall provide a written statement explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. The occurrence should also be reported in the next semiannual compliance monitoring report pursuant to Condition 50 of this permit. (9VAC5-80-110 F. 2)
53. **General Conditions - Failure/Malfunction Reporting** - In the event that any affected facility or related air pollution control equipment fails or malfunctions in such a manner that may cause excess emissions for more than one hour, the owner shall no later than four

daytime business hours after the malfunction is discovered, notify the Blue Ridge Regional Office such failure or malfunction and within 14 days provide a written statement giving all pertinent facts, including the estimated duration of the breakdown. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the owner shall notify the Blue Ridge Regional Office.

(9VAC5-80-110, 9VAC5-20-180 and Condition 25 of the 06/08/2007 Permit Document)

54. **General Conditions - Severability** - The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit.  
(9VAC5-80-110)
55. **General Conditions - Duty to Comply** - The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is ground for enforcement action; for permit termination, revocation and reissuance, or modification; or, for denial of a permit renewal application.  
(9VAC5-80-110)
56. **General Conditions - Need to Halt or Reduce Activity not a Defense** - It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.  
(9VAC5-80-110)
57. **General Conditions - Permit Modification** - A physical change in, or change in the method of operation of, this stationary source may be subject to permitting under State Regulations 9VAC5-80-50, 9VAC5-80-1100, 9VAC5-80-1605, or 9VAC5-80-2000 and may require a permit modification and/or revisions except as may be authorized in any approved alternative operating scenarios.  
(9VAC80-110, 9VAC5-80-190, and 9VAC5-80-260)
58. **General Conditions - Property Rights** - The permit does not convey any property rights of any sort, or any exclusive privilege.  
(9VAC5-80-110)
59. **General Conditions - Duty to Submit Information** - The permittee shall furnish to the Board, within a reasonable time, any information that the Board may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Board copies of records required to be kept by the permit and, for information claimed to be confidential, the permittee shall furnish such records to the Board along with a claim of confidentiality.  
(9VAC5-80-110)

60. **General Conditions - Duty to Submit Information** - Any document (including reports) required in a permit condition to be submitted to the Board shall contain a certification by a responsible official that meets the requirements of 9VAC5-80-80 G.  
(9VAC5-80-110)
61. **General Conditions - Duty to Pay Permit Fees** - The owner of any source for which a permit was issued under 9VAC5-80-50 through 9VAC5-80-300 shall pay annual emissions fees, as applicable, consistent with the requirements of 9VAC5-80-310 through 9VAC5-80-350 and annual maintenance fees, as applicable, consistent with the requirements of 9VAC5-80-2310 through 9VAC5-80-2350.  
(9VAC5-80-110, 9VAC5-80-310 et seq., and 9VAC5-80-2310 et seq.)
62. **General Conditions - Fugitive Dust Emission Standards** - During the operation of a stationary source or any other building, structure, facility, or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited to, the following:
  - a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land;
  - b. Application of asphalt, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;
  - c. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or similar operations;
  - d. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion; and,
  - e. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried sediments resulting from soil erosion.  
(9VAC5-80-110 and 9VAC5-50-90)
63. **General Conditions - Startup, Shutdown, and Malfunction** - At all times, including periods of startup, shutdown, and soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing

emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

(9VAC5-80-110 and 9VAC5-50-20 E)

64. **General Conditions - Alternative Operating Scenarios** - Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described in 9VAC5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9VAC5 Chapter 80, Article 1.  
(9VAC5-80-110)
65. **General Conditions - Inspection and Entry Requirements** - The permittee shall allow DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:
- a. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.
  - b. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.
  - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.
  - d. Sample or monitor at reasonable times' substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(9VAC5-80-110)

66. **General Conditions - Reopening for Cause** - The permit shall be reopened by the Board if additional federal requirements become applicable to a major source with a remaining permit term of three years or more. Such reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 9VAC5-80-80 F. The conditions for reopening a permit are as follows:

- a. The permit shall be reopened if the Board or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- b. The permit shall be reopened if the administrator or the Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
- c. The permit shall not be reopened by the Board if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9VAC5-80-110 D.

(9VAC5-80-110)

67. **General Conditions - Permit Availability** - Within five days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request.  
(9VAC5-80-110 and 9VAC5-80-150)

68. **General Conditions – Permit Availability** – The permittee shall keep a copy of the June 1, 2020 permit document on the premises of the facility to which it applies.  
(9VAC5-80-110 and Condition 31 of the 06/01/2020 Permit Document)

69. **General Conditions - Transfer of Permits**

- a. No person shall transfer a permit from one location to another, unless authorized under 9VAC5-80-130, or from one piece of equipment to another.
- b. In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the Board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9VAC5-80-200.
- c. In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the Board of the change in source name within 30 days of the name change and shall comply with the requirements of 9VAC5-80-200.

(9VAC5-80-110 and 9VAC5-80-160)

70. **General Conditions - Permit Revocation or Termination for Cause** - A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of 9VAC5 Chapter 80 Article 1. The



Board may suspend, under such conditions and for such period of time as the Board may prescribe any permit for any grounds for revocation or termination or for any other violations of these regulations.

(9VAC5-80-110, 9VAC5-80-190 C, and 9VAC5-80-260)

71. **General Conditions - Duty to Supplement or Correct Application** - Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit.  
(9VAC5-80-110 and 9VAC5-80-80 E)
72. **General Conditions - Stratospheric Ozone Protection** - If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F.  
(9VAC5-80-110 and 40 CFR Part 82)
73. **General Conditions - Asbestos Requirements** - The permittee shall comply with the requirements of National Emissions Standards for Hazardous Air Pollutants (40 CFR 61) Subpart M, National Emission Standards for Asbestos as it applies to the following: Standards for Demolition and Renovation (40 CFR 61.145), Standards for Insulating Materials (40 CFR 61.148), and Standards for Waste Disposal (40 CFR 61.150).  
(9VAC5-60-70 and 9VAC5-80-110)
74. **General Conditions - Accidental Release Prevention** - If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined by 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68.  
(9VAC5-80-110 and 40 CFR Part 68)
75. **General Conditions - Changes to Permits for Emissions Trading** - No permit revision shall be required under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.  
(9VAC5-80-110)
76. **General Conditions - Emissions Trading** - Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:
  - a. All terms and conditions required under 9VAC5-80-110, except subsection N, shall be included to determine compliance.

- b. The permit shield described in 9VAC5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.
- c. The owner shall meet all applicable requirements including the requirements of 9VAC5-80-50 through 9VAC5-80-300.

(9VAC5-80-110)

## ATTACHMENTS

### Attachment A – Dye Lines No. 5 and No. 6 – Compliance Assurance Monitoring (CAM) Plan

Description	Indicator 1	Indicator 2	Indicator 3
<b>Indicator</b>	<b>Hood Negative Pressure</b>	<b>Pre-Cooler Exhaust Temperature</b>	<b>Pressure Drop Across Demister</b>
<b>Measurement Approach</b>	The pressure is measured by differential pressure gauge	The temperature is monitored by a thermocouple.	The pressure is measured by a differential pressure gauge.
<b>Indicator Range</b>	Pressure drop reading $\leq -0.25$ inches of water. An excursion is defined as a pressure drop reading of greater than $-0.25$ inches of water ( $-0.024$ inches of water or greater).	Exhaust temperature of $\leq 100^{\circ}\text{F}$ . An excursion is defined as a temperature reading of $\geq 100^{\circ}\text{F}$ .	Pressure drop $\geq 4.0$ and $\leq 12.0$ inches of water. An excursion is defined as a pressure drop reading outside of the indicator range.
<b>QIP Threshold</b>	No more than five percent of the operating time below the indicator range in any semi-annual reporting period (e.g., for pressure readings recorded for 120 shifts, six or more pressure drop readings recorded at less than $0.25$ inches of water).	No more than five percent of the operating time above the indicator range in any semi-annual reporting period (e.g., for 2,000 operating hours, 100 hours of recorded temperature readings at or above $100^{\circ}\text{F}$ ).	No more than five percent of the operating time outside the indicator range in any semi-annual reporting period (e.g. for pressure readings recorded for 100 operating days, five or more pressure drop readings recorded outside the acceptable differential pressure range).
<b>Performance Criteria: Data Representatives</b>	The monitoring system for each hood consists of a differential pressure gauge that compares the pressure inside and outside the hood exhaust duct. Accuracy: $\pm 1\%$	The monitoring system for the pre-cooler consists of a thermocouple located in the exhaust duct from the pre-cooler. Accuracy: $\pm 5^{\circ}\text{F}$	The monitoring system for the demister consists of a differential pressure gauge that measures the difference in pressure across the inlet and outlet of the demister. Accuracy: $\pm 1\%$
<b>Performance Criteria: Verification of Operational Status.</b>	Pressure drop $\leq -0.25$ inches of water across the hood.	Temperature $\leq 100^{\circ}\text{F}$ .	Pressure drop across the demister between $4.0$ and $12.0$ inches of water.
<b>Performance Criteria: QA/QC Practices and Criteria</b>	Differential pressure gauge is to be factory calibrated. The accuracy of the gauge will be checked at least annually. The manufacturer's recommendations will be used at a minimum.	The thermocouple is to be factory calibrated. The accuracy of the thermocouple will be checked at least annually. The manufacturer's recommendations will be used at a minimum.	Differential pressure gauge is to be factory calibrated. The accuracy of the gauge will be checked at least annually. The manufacturer's recommendations will be used at a minimum.

Description	Indicator 1	Indicator 2	Indicator 3
<b>Performance Criteria: Monitoring Frequency</b>	Differential pressure shall be measured continuously and observed at least once per shift.	Temperature readings are measured continuously.	Differential pressure shall be measured continuously and observed at least once per day.
<b>Data Collection Procedures</b>	Results of once per shift observations shall be recorded in a log.	The temperature measurements will be recorded continuously.	Results of once per day observations shall be recorded in a log.